

No. 21-440

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IN THE  
**Supreme Court of the United States**

\_\_\_\_\_  
MIGUEL ANGEL SANTANA,  
*Petitioner,*

v.

STATE OF MARYLAND,  
*Respondent.*

\_\_\_\_\_  
**On Petition for Writ of Certiorari to the  
Maryland Court of Special Appeals**

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**CERTIFICATE OF SERVICE**

I, Timothy P. O'Toole, a member of the Bar of this Court, hereby certify that, on October 22, 2021, I caused three copies of the **Brief of *Amici Curiae* Due Process Institute, National Association for Public Defense, The Cato Institute, and Innocence Project in Support of Petitioner** in this case to be served by first-class mail, postage prepaid, on counsel of record for all parties as set forth below. I also caused an electronic copy of the brief in PDF format to be served on counsel of record for each party in this case. I further certify that all persons required to be served have been served.

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